

***EXHIBIT NO. 24***

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December 31, 2002

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David Sanford  
Gordon Silberman Wiggins & Childs, PC  
7 Dupont Circle NW, Suite 200  
Washington, DC 20036

RE: Bert v. AK Steel Corporation

Dear David:

Enclosed are copies of the joint discovery plan and the Rule 26 (f) report of the parties filed with the Court today.

Sincerely,

  
Gregory P. Rogers

GPR/jd  
Encl.

cc: Paul Tobias

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

VIVIAN BERT, et al. : Case No. C-1-02-467  
Plaintiffs, :  
v. : Judge Beckwith  
AK STEEL CORPORATION : Magistrate Judge Hogan  
Defendant : JOINT DISCOVERY PLAN

Now come all parties to this case, by and through their respective counsel, and hereby jointly submit to the Court this Joint Discovery Plan, pursuant to the Court's Pretrial Procedure Outline.

**1. RULE 26(a) PROCEDURES**

The parties agree to delay the initial disclosures concerning individual Plaintiffs and the initial disclosures concerning class issues until February 3, 2003. This delay is due to the large number of individual Plaintiffs and the size of the putative class and the large number of manufacturing facilities involved with the putative class.

**2. DISCOVERY ISSUES AND DATES**

- A. Discovery will need to be conducted on the issues of class certification, liability, damages and all other issues involved in the pleadings.
- B. The parties recommend that discovery should be bifurcated between liability and damages. The parties further recommend that initial discovery be limited to class certification issues until such time as the issue of class certification is finally resolved and that remaining discovery be scheduled thereafter.
- C. The parties agree to a deadline of disclosure and report of plaintiffs' expert(s) by January 5, 2004. Plaintiffs propose simultaneous disclosure of defendant's experts and reports and then disclosure and reports of rebuttal experts by February 5, 2004. Defendant proposes that disclosure and report of its expert(s) be made by April 5, 2004.
- D. Parties agree to a discovery cutoff for all class issues except expert depositions by December 1, 2003. Plaintiffs propose that depositions of experts be complete

by March 1, 2004. Defendants propose that the depositions of experts be complete by May 1, 2004.

E. Anticipated discovery problems: None at this time.

3. **LIMITATIONS ON DISCOVERY**

A. Changes in the limitations on discovery.

- Plaintiffs propose 20 depositions per side. Defendant proposes that it may depose all named plaintiffs and may take up to ten additional depositions. Defendants further propose that the named plaintiffs be able to take 10 depositions.

If additional depositions appear to be necessary as discovery proceeds, the party seeking such additional depositions may seek leave of court.

Plaintiffs propose that Defendants may serve up to 15 interrogatories on each plaintiff and that plaintiffs be permitted to serve up to 100 interrogatories on Defendant. Defendant proposes that it may serve up to 15 interrogatories on each plaintiff and that Plaintiffs be permitted to serve up to 25 interrogatories.

B. Protective Order

- A protective order will likely be jointly submitted to the Court on or before February 3, 2003.

4. **OTHER COURT ORDERS UNDER RULE 29(C) OR RULE 16(B) AND (C)**

A deadline of May 1, 2003 is established for the amendment of the complaint to:

- add parties
- add additional claims
- There is no request for a Court Order until Rule 26(c) at this time.

David Sanford by GPR Rogers  
David Sanford  
per a.s.m.

Eric Bachman  
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